



Via Certified Mail

August 23, 2018

Mr. Brian Storey
US EPA - OAQPS
Sector Policies and Programs Division
Research Triangle Park, NC 27711

Re: Request for One Year Brick MACT (Subpart JJJJ) Compliance Extension
Brick Kiln No. 36 (ID No. 06)
Roanoke Brick Plant
General Shale Brick Inc.
Blue Ridge, VA

Dear Mr. Storey:

General Shale Brick Inc. (General Shale) owns a brick manufacturing plant that is located at 770 Webster Road, Blue Ridge, Virginia, which we commonly call the Roanoke Brick Plant. The facility currently operates the referenced brick kiln at the site. The referenced brick kiln has been determined to be a major hazardous air pollutant (HAP) emissions source.

General Shale has determined that it will install a dry injection fabric filter (DIFF) that will replace an existing dry limestone adsorber on the referenced brick kiln to control HAP emissions below the major source threshold.

The Subpart JJJJ compliance date for "existing source MACT" is December 26, 2018. General Shale has reviewed its schedule and has determined that there is not ample time to receive the required permits from the Virginia Department of Environmental Quality, complete construction after receiving the required permits, conduct operational shakedown, and have the DIFF fully operational by this date.

For the reasons presented above in this letter, General Shale is requesting a one year extension from December 26, 2018 to December 26, 2019 in order to demonstrate that Brick Kiln No. 36 (ID No. 06) will be a minor source of HAP. This request is being filed in accordance with the EPA memorandum dated June 14, 2018 and 40 CFR Part 63.6(i)(3)-(7). The requirements of the referenced regulations are outlined below:

On behalf of General Shale, I want to thank you and your staff in advance for your consideration of our one year compliance extension request for Brick Kiln No. 36 (ID No. 06). If you have any questions regarding this request, please feel free to contact Mr. Warren Paschal of General Shale at (919) 774-6533, Ext. 221.

Sincerely,

Kevin Ham
Vice President

cc: Mr. Warren Paschal, General Shale
Mr. Dale Overcash, Trinity Consultants

Request for Extension of Compliance
40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants
Brick and Structural Clay Products Manufacturing Source Category

I. General Information

A. Facility Information

Facility Name: General Shale Brick, Inc. Plant No. 36
Facility Street Address: 2353 Webster Road
Facility Local Contact: Charlie Watts Title: Plant Manager Phone: 540-977-1896
City: Roanoke State: Virginia ZIP Code: 24012
Operating Permit Number (OPTIONAL) Facility I.D. Number (OPTIONAL)
Responsible Official's Name/Title: Kevin Ham/Vice President
Street Address: 3015 Bristol Highway
City: Johnson City State: Tennessee ZIP Code: 37601

B. Indicate the relevant standard or requirement for which you request a compliance extension:

Title 40, Part 63, Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing).

II. Timeliness of Request

Pursuant to 40 C.F.R. Part 63, Subpart A, sources must submit requests for extension of compliance with a National Emission Standards for Hazardous Air Pollutants no later than 120 days prior to the affected source's compliance date (unless the elements are met for an alternative submittal date, as outlined in 40 C.F.R. § 63.6(i)).

This request:

☒ (1) is being submitted on or before August 28, 2018 (120 days before the compliance deadline of December 26, 2018); or

☐ (2) is being submitted after August 28, 2018 but before December 26, 2018, because the need for the compliance extension arose after August 28, 2018, and the need arose due to circumstances beyond reasonable control of the owner or operator. An addendum may be included to explain the reasons for the delay in submittal.

Note: A nonfrivolous request under (1) will stay the applicability of the rule as to the emission points in question until the request is granted or denied. A denial will be effective as of the date of denial or the original compliance date, whichever is later. A nonfrivolous request under (2) will stay the applicability of the rule as to the emission points in question until such time as the request is granted or denied.

III. Eligibility

Are you eligible to apply for a compliance extension because you are unable to comply with the relevant standard by December 26, 2018 and need additional time for installation of controls (which includes time to achieve area source status)? 40 C.F.R. § 63.6(i)(4)(i)(A).

☒ Yes ☐ No

The statutory authority for compliance extensions under Clean Air Act Section 112(i) includes adopting controls or limits necessary to qualify as a “synthetic minor” or “area” source.

IV. Compliance Schedule Information

- A. Select the applicable approach described below (Option 1 or 2) that will be taken by your facility to achieve compliance within one year of the compliance date for the relevant standard (including, if applicable, actions necessary for your facility to qualify as a synthetic area source). 40 C.F.R. § 63.6(i)(6)(i)(A). At your option, you may provide additional detail in an attachment to this form.

☐ **OPTION 1:** This facility intends to install controls to reduce emissions to the level of the applicable standard and will be applying for a state minor NSR construction permit, if required by the state regulations, to install the controls. If your compliance approach involves installing physical controls, undertaking material substitution, or some other method, you may wish to describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as if EPA revises the NESHAP such that compliance can be achieved by the facility without the need to install controls.

☒ **OPTION 2:** This facility needs additional time to become an area source. This facility has submitted or will submit a permit application seeking an area source level emission limit, such that it will not be subject to the NESHAP. If you are installing physical controls, undertaking material substitution, or restricting operations to become an area source, you may describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as a request to eliminate any such limitation that has been issued if EPA revises the NESHAP such that compliance can be achieved by the facility without the need for an area source permit.

- B. Describe your compliance schedule. 40 C.F.R. § 63.6(i)(6)(i)(B)(1)-(2).

1. My facility will submit an application for any required permits by October 15, 2018.

☒ Yes ☐ No

2. If compliance is to be achieved through a means other than becoming an area source, the facility will begin on-site construction, installation of emission control equipment, or initiate a process change within 30 days of

obtaining any required permits for such action. 40 C.F.R. § 63.6(i)(6)(i)(B)(1).
If no permits are required for such action, the facility will initiate the activities as applicable by the dates specified below:

☐ On-site construction Date:

☐ Installation of controls Date:

☐ Process change Date:

☒ Application for DIFF Date: October 15, 2018

Comments (OPTIONAL):

Due to permitting time constraints, final compliance with emission limits, operating limits, testing requirement, and work practice standards will be demonstrated prior to December 26, 2019.

3. Any restriction on emissions, on-site construction, installation of emission control equipment, or a process change will be completed by December 26, 2019. 40 C.F.R. § 63.6(i)(6)(i)(B)(1).

Comments (OPTIONAL):

Dry Injection Fabric Filter will be installed to reduce emissions below 10/25 tons/year NESHAP thresholds.

4. Specify the date by which final compliance is to be achieved. 40 C.F.R. § 63.6(i)(6)(i)(B)(2).

Date: No later than December 26, 2019.

Comments (OPTIONAL):

- C. You may provide additional information regarding your method of achieving compliance in an attachment to provide a fuller description of your control strategy than outlined above, as appropriate.

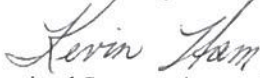
V. Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this request is true, accurate, and complete.

Name of Responsible Official (Print or Type): Kevin Ham

Title: Vice President

Signature of Responsible Official



Submittal Instructions: Submit your completed form, and any addenda, to:

U.S. Environmental Protection Agency
Attention: Mr. Brian Storey
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive, Mail Code: D243-04
Research Triangle Park, NC 27709

You may also wish to send a copy of this submittal to your state or local permitting authority. Be sure that the submittal is made by August 28, 2018 and that you retain proof of the date of submittal for your records.



General Shale

P.O. Box 3547

Johnson City, Tennessee 37602

RETURN SERVICE REQUESTED
ADDRESS SERVICE REQUESTED



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Mr. Brian Storey
US EPA - OAAQS
Sector Polices and Programs Division
Research Triangle Park, NC 27711

